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November 5, 2024

Electronically Filed

The Honorable Sean H. Lane
United States Bankruptcy Court
The Charles L. Briant Jr. Federal Building and Courthouse
300 Quarropas Street
White Plains, NY 10601

Re: David Ghatanfard
Ch. 7 Case No.: 23-22840 (shl)

Dear Judge Lane:

I serve as counsel to David Ghatanfard, the above-referenced Chapter 7 debtor (the “Debtor”). I am writing with respect to the proposed order submitted by Yann Geron, Chapter 7 Trustee. I do not believe that such order reflects the Court’s ruling at the hearing on October 29, 2024. At the hearing, the Court indicated that the exemption would be permitted to the extent allowed under the law as my proposed order states.

Although I conveyed this to Mr. Geron’s office, I was not able to respond formally to his proposed order until today as I was required to attend an in-person mediation at the New York State Supreme Court.

Thank you.

Respectfully,

/s/ Anne Penachio

Anne Penachio

AP:jr